

Summary:

- The scale of the development is excessive and **must not** be considered in isolation from other East Anglian NSIP schemes
- The repurposing of grade 2 agricultural land for solar PV is an unacceptable risk to food security
- Existing native hedges must be protected to ensure effective screening *during* construction
- Solar schemes *can* enhance biodiversity, but ONLY if managed as pasture / meadow
- Fire risk and its management requires clarification
- Exceptional loads **must not** use rural road networks, nor result in irreversible damage to rural villages, communities, and ecosystems
- Local communities should be stakeholders in, rather than pawns affected by the scheme
- The most effective mitigation would be a guarantee of local and discounted energy security
- The current proposal would contravene the applicant's intent to "*contribute to delivering the UK's transition to decarbonised and low cost renewable energy provision whilst leaving a positive legacy of benefits for the people*"

Introduction:

Seething Parish Council take note of the outcome of the meetings that took place 15th-17th September, and the questions arising thereof (*ExQ1* issued 23rd September). We here submit a further written representation to reiterate and emphasise many specific issues pertaining to the impacts of any such solar development and how these might be mitigated were the scheme to be approved.

We recognise that the accelerating climate emergency necessitates urgent transition from carbon-generating fossil fuels to renewable energy sources. However, such a transition must be delivered in a manner that minimises impact upon local communities and their heritage; it should not damage, but instead benefit long-established ecosystems. Moreover, evidence of benefit to local communities over and above a reduction in national CO₂ emissions should be demonstrated (*Q1.2.13*). To this end we highlight the following:

Scale:

The overall size of the development encompassing approximately 1100ha of agricultural land is excessive, especially when considered at a local rather than regional scale. Although this may represent only 0.1% of arable land in East Anglia (figures derived from HM Gov. Agricultural Facts: East of England Oct 2025), within the corridor affected by the development, the repurposing of land from arable to solar PV areas is hugely more significant. Furthermore (and reassuringly highlighted by *action points 45 & 46* raised by Issue Specific Hearing 1), the impact of other regional Nationally Significant energy schemes (such as High Grove Solar, The Drovers, Tasway Energy Park), and sizeable local proposals (e.g proposed Shipmeadow and Ringsfield solar farms) upon the communities, heritage, landscape and ecosystems of East Anglia must be recognised.

Energy security vs. Food security:

Evidenced by current global events, a need to maintain and improve national energy security is paramount. However, in parallel with energy concerns, enhancement of food security is of

equal importance: this, in turn, necessitates the maintenance of biodiversity, and the protection of local environments and ecosystems. Consequently, the validity of repurposing large areas of arable land to solar PV production needs to be questioned carefully, and we would refer to the applicant's soil survey. Herein, it is demonstrated that whilst the Natural England 2018 Agricultural Land Classification map Eastern Region (ALC008) suggests that the East Pye proposal would repurpose predominantly *poor* grade 4 or *moderate to good* grade 3 soils, their own survey identifies large areas of the proposed PV and battery sites as high quality grade 2 soils. Indeed paragraph 3.5.27 of the applicant's Design Approach Document states: *An Agricultural Land Classification (ALC) survey has been carried out for the Scheme. This identified that the Order Limits includes 32.8% Grade 2 BMV land.* Specifically, sites 1; 2; 4A,B (partial); 5A,B; and 7A,C,F are identified within the proposal as of grade 2 classification.

It is self-evident that these highly productive grade 2 soils must be protected and should not be repurposed to solar PV use. The consequent reduction in scale would thereby benefit South Norfolk communities.

Visual impact and PRow:

Q1.2.10-1.2.12 in ExQ1 highlight the inadequate detail provided by the applicant regarding location and installation of tracker panels (north-south orientation with max height 4.5m) and fixed arrays (east-west orientation with max height 3.5m); moreover, the extent of buffer areas remain poorly defined. The placement of 4.5m height tracker arrays close to housing, PRow or sites otherwise visible to communities is unacceptable. PV units should be positioned sympathetically in relation to sight lines and existing geography to minimise adverse visual impact.

To this end, preservation of existing native trees, hedgerows, pastures and associated water bodies, particularly along PRow is essential: not only to minimise any adverse visual impacts but to preserve and enhance local ecosystems. It would be wholly unacceptable to remove or damage the native flora that currently screen many proposed solar PV sites. We would emphasise that paragraphs 4.2.60 *et seq.* within the *Environmental Statement Volume 3: Appendix 8.1 March 2026* identify the quality and species diversity within the site areas relevant to Seething Parish Council. Consequently, the necessity of measures described in section 3 of *Outline Landscape and Ecology Management Plan Revision 1 March 2026* cannot be overemphasised.

It is imperative that the proposal does not impede existing public rights of way: ideally such a development should *enhance* public rights of way through repurposing of agricultural land. Solar development should similarly not impede historic rights of way, absent from the NCC definitive map but clearly evident on older OS Maps. We would refer you to our June 2026 written representation for precise details of Seething rights of way potentially affected by the proposal.

Ecosystem / biodiversity:

We recognise that peer-reviewed publications demonstrate the potential ecosystem benefits that might arise from repurposing areas of previous intensive agricultural use (particularly of low-grade soils) to solar PV and we would reiterate our previous opinion that management of solar PV areas as meadow/ pasture for grazing is essential. Paragraphs 3.12.15-17; 3.13.9-11; and 3.15.10-4 within *Outline Landscape and Ecology Management Plan Revision 1 March 2026* are therefore highly pertinent. Regular herbicide spraying to manage growth is unacceptable.

An environmentally sympathetic scheme must avoid or minimise damage to soils and in our opinion, ground screws or similar non-destructive / removable structures should be utilised rather than concrete foundations.

Highways:

As detailed extensively at the Open Floor Hearings, the current highways and traffic proposals of the construction phase of the development would have inevitable and irreversible impacts upon many local villages and communities. Within the Parish of Seething, and relevant to sites 10A-E and the associated CRC14 are Harvey Lane and Upgate Road: these are small rural single carriageway roads wholly unsuitable for HGV and exceptional vehicle loads.

The proposal **must not** utilise exceptional load traffic routes that necessitate damage, and irreversible alteration to existing rural road networks, local architecture or heritage, watercourses and biodiverse roadsides that are effective nature reserves (whether or not they are formally defined as such reserves).

Fire risk:

Highlighted at the OFH sessions (and evident from Q1.6.4 of ExQ1), and of increasing concern to our community as a result of drought status, is the lack of strategy to deal with wildfires that could potentially affect and spread within the solar PV sites. This must be addressed, as the “natural grassland” management necessary to maintain and promote local ecosystems could provide potential fuel source for wildfire. Although distant from Seething, we also share serious concerns regarding fire management strategies at BESS sites.

Conclusion and Mitigation:

Our climate emergency mandates an urgent need to enhance renewable energy generation and transition from fossil fuel dependency. However, the scheme as proposed would contravene the applicant’s own intent to “*contribute to delivering the UK’s transition to decarbonised and low cost renewable energy provision whilst leaving a positive legacy of benefits for the people*” This proposal would have enormous adverse impact upon the communities of South Norfolk and compromises food security by unsupportable repurposing of productive soils.

How might such impact be mitigated beyond significant reduction in scale? To this end it is essential that any large-scale solar scheme results in **local** energy security, and that the low cost of renewable energy should be similarly reflected in a **local** energy pricing structure. An acceptable solar scheme should, in addition to reducing CO₂ footprint, provide local employment opportunity and benefit the local economy rather than result in “offshore” profit generation. South Norfolk communities should be stakeholders rather than pawns in any such scheme.